



April 15, 2015

Item No. 5

AUTHORIZATION TO ESTABLISH CHA'S LANGUAGE ACCESS POLICY

To the Honorable Board of Commissioners:

RECOMMENDATION

The Office of Diversity is recommending to establish the CHA's Language Access Policy to standardize services provided to CHA applicants, CHA and non-CHA residents who are Limited English Proficiency (LEP) households in the City of Chicago. In accordance with federal, state and local law, CHA will take reasonable steps to ensure meaningful access to its programs by LEP households. Meaningful access is free language assistance that does not impose an undue financial burden. The Office of Diversity will work with internal Language Access Liaisons on the implementation of the Language Access Policy to increase the quality and reliability of services provided to LEP households and whenever possible align CHA's processes with the City's Language Access Plan(s). Therefore, we seek approval to implement the CHA's Language Access Policy, which includes, but is not limited to the following:

1. Laws prohibiting national origin discrimination as it affects persons with LEP
 - a. Title VI of the Civil Rights Act of 1964
 - b. Section 188 of the Workforce Investment Act
 - c. Title VII of the Civil Rights Act of 1964
 - d. Title VIII of the Civil Rights Act of 1968
2. HUD's definition of LEP persons
3. HUD's Four Factor Analysis requirements
4. HUD's recommended language assistance to LEP persons

The Chief Administrative Officer, the Office of the General Counsel and the Office of Diversity completed all necessary due diligence to support the submission of this initiative and recommend the approval of this item accordingly.

CORPORATE GOAL

Expand services to more residents, targeted to their needs, and at critical milestones in their lives.

PROCUREMENT INFORMATION

CHA is currently under contract with Multilingual Connections for in-person interpretation and document translation services. Globo Language Solutions provides telephonic interpretation services. CHA plans to execute an 8-month extension with these vendors (due to expire on April 2015) until December 2015.

CHA is collaborating with the City of Chicago's Office of New Americans and plans to enter into an Intergovernmental Agreement for translation and interpretation services. The procurement timeline for this item is currently in progress.

GENERAL BACKGROUND

Regulation under Title VI of the Civil Rights Act and Section 188 of the Workforce Investment Act, enforced by the Department of Labor (DOL) Civil Right Center (CRC), require CHA to provide language assistance to LEP persons. HUD's Recommendations for Language Assistance, include:

1. Oral interpretation services
2. Telephone service lines interpreter
3. Bilingual staff
4. Written translation services

The Board action recommended in this item complies in all material respects with all applicable Chicago Housing Authority board policies and all applicable federal (HUD) procurement laws.

The Chief Administrative Officer concurs with the recommendation to establish CHA's Language Access Policy to standardize and streamline the translation and interpretations services provided to LEP persons.

The CEO/President recommends the approval to establish CHA's Language Access Policy.

RESOLUTION NO. 2015-CHA-30

WHEREAS, the Board of Commissioners has reviewed the Board Letter dated April 15, 2015 entitled “AUTHORIZATION TO ESTABLISH CHA’s LANGUAGE ACCESS POLICY”;

THEREFORE, BE IT RESOLVED BY THE CHICAGO HOUSING AUTHORITY

THAT the Board of Commissioners authorizes the Chief Executive Officer to implement the revised CHA’s Language Access Policy on May 1, 2015.



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